

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:20-CR-0001
	:	
NASSER LATIF, a.k.a. "John Latif,"	:	Judge Rossie D. Alston, Jr.
	:	
Defendant	:	

CONSENT MOTION TO CONTINUE SENTENCING DATE

On April 2, 2020, defendant Latif and the United States jointly moved to continue Mr. Latif's sentencing date for ninety days, until July 17, 2020. The Court granted the joint motion on April 2, 2020 (Dkt 14).

The defendant, with the consent of the United States, hereby requests that Mr. Latif's sentencing date be continued for an additional approximate 90 days, until October 14, 2020 or October 16, 2020, as is convenient for the Court.

In support of the initial joint motion to continue sentencing (Dkt 13), the parties noted defendant's entry of a guilty plea without being formally charged, his compliance with all aspects of supervision, his age, and numerous health problems resulting in a compromised immune system. These health factors placed him in the Center for Disease Control and Prevention's category of those who are most at risk to contract, and die from, the COVID-19 disease. With the subsequent spread of the COVID-19 virus in federal prison facilities, Mr. Latif's risk of infection is even greater now. There continues to be no urgency in bringing the defendant, counsel, the Court, and others in for a sentencing hearing in this matter, and Mr. Latif does not pose a risk of flight or danger to the community.

Accordingly, the government and Mr. Latif jointly move the Court to continue his sentencing hearing for an additional ninety days, to October 14, 2020 or October 16, 2020.

A proposed order is attached for the Court's consideration.

/s/ David B. Smith

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Certificate of Service

I hereby certify that on the 17th day of June, 2020, I electronically filed the foregoing pleading and proposed order with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s):

AUSA Katherine Rumbaugh [Katherine.Rumbaugh@usdoj.gov]
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And I hereby certify that I have mailed the document by United States mail, first class postage prepaid, to the following non-CM/ECF participant(s), addressed as follows: [none].

/s/ David B. Smith

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